

ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0037231

I. GENERAL INFORMATION

Facility: Town of Eatonville Wastewater Treatment Plant
201 Center Street
P.O. Box 309
Eatonville, WA 98328

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on June 10, 2003, and June 23, 2003, and accepted by the Department on June 25, 2003. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-216 and WAC 173-200.

The application for Town of Eatonville Wastewater Treatment Plant was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Town of Eatonville Wastewater Treatment Plant for the discharge of wastewater to Mashel River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1998. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a

complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on August 27, 1999.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from this permit. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 13, 2003, and July 20, 2003, in *the Tacoma News Tribune* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on February 18, 2004, in the *Eatonville Dispatch* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6279, or by writing to the address listed above.

RESPONSE TO COMMENTS

This response to comments (RTC) is an appendix to the fact sheet addendum for the above-referenced National Pollutant Discharge Elimination System (NPDES) permit. The RTC summarizes comments received during the 30-day public notice and comment period on the draft permit, and provides the Department of Ecology (Department) response. All changes to the draft permit are noted below. The Department has determined to issue this permit as revised.

Comments were received from two residents of the Town of Eatonville.

Mr. Robert Walter's Comment Letter:

March 12, 2004

Glenn Pieritz
Municipal Facility Manager
Department of Ecology
Southwest Regional Office
Water Quality Program
P.O. Box 47775
Olympia, WA 98504-7775

Dear Mr. Pieritz:

I read your letter of March 3, 2004 to the mayor of the Town of Eatonville regarding your inspection of the Eatonville Wastewater Treatment Facility outfall on the Mashell River.

For the record, I walked the river near the treatment facility late last summer, when the river's flow was much lower than it is now. I saw considerable amounts of black slime on the river rocks next to and below the outfall area. I also saw what I believed to be algae growth in that area as well. It is my opinion the deleterious effects of water coming from the treatment plant upon river water quality can only be truly measured during low flow periods in the drier months.

It is my understanding that the Town of Eatonville provided its own water utility with the original shoreline permit for the wastewater treatment facility several years ago. There appears to have been little mitigation done, post-construction, to restore levels of streamside shade in that area. There is a huge patch of what I believe is knapweed, an invasive, noxious weed, covering the outfall bench between the treatment plant and the river. This is a low-growing plant. There are very few shrubs or trees that would provide cooling shade along that section of the river.

The quality of the river water is of great concern to me. I respectfully request that the Department of Ecology more rigorously monitor the effects of the town's growing population on water quality throughout the year.

Sincerely,

Robert J. Walter
140 Antonie Ave. N.
P.O. Box 131
Eatonville, WA 98328

Ecology's Response to Mr. Walter's Letter:

I will be making several site visits to the Town of Eatonville Wastewater Treatment Plant (WWTF) throughout the summer which will include monitoring of the algae growth. Should the algae be just as intense upstream as well as downstream of the WWTF outfall I would offer that the algae is naturally occurring and other factors such as those mentioned in your letter may be the major contributors to the algae problem.

Citizens may also wish to look for invertebrates under rocks in the river as a good biological indicator of a healthy stream. Shading by trees along the river bank should also be encouraged whenever possible since sunlight and clear river water will almost always produce algae. The schedule for doing total maximum daily loading study (TMDLs) by the Department is currently being redone, you may want to check with Ron McBride at (360) 407-6469 to see when a TMDL might be scheduled for the Mashel River.

Please contact Thomas A. Bertman, Pierce County Noxious Weed Coordinator, at (253) 798-7263, for the control of Knapweed.

Mr. James P. Van Eaton's Comment Letter:

James P Van Eaton
P.O. Box 730
Eatonville, WA 98238

Water Quality Permit Coordinator
Dept. of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA. 98504-7775

Subject: NPDES Permit No. WA003723

Fact Sheet errors and discrepancies

Page #1 Collection System Status

- The Lynch Creek Rock Quarry is not in Eatonville's GMA.
- The 5,880 feet of force main and three pump stations are not going to happen in the next five years.

Page #3 Discharge Outfall

- The Mashell River is not a glacial fed stream.
- I visited the outfall there are no warning signs posted.

Page #8 Antidegradation

- The last paragraph the author states she is "unable to determine if the ambient water quality is either higher or lower....."It appears the author is guessing.

Page #9 Considerations of Surface Water Quality

- The statements “The Mashel(sic) River is glacially fed” and “ River flows general(sic) peak in June.....” are wrong. Examination of the stream flow data shows peak flows occur during winter rain storms and there is no glacier in the Mashell River watershed.

Comments on the Addendum to the Fact Sheet

Page #1 Application Review

- The statement “no changes in.....or volume of wastewater has occurred.” The Town of Eatonville has on average 30+ new homes built every year this must add to the volume.

General Comments

I strongly suggest there is a fundamental error when it comes to calculating the dilution factors. The USGS gauging station#12087000 on the Mashell River used for flow volume is below where the Little Mashell River empties into “Big” Mashell River. Eatonville’s wastewater treatment plant discharges above this point. The volume of this tributary is significant and it makes the parameter 7Q10 low flow of 8cfs erroneous. If the flow data from the summer of 2003 is used, the driest in 100 years, the 7Q10 number would even be lower. Our family has lost a beneficial use of this river. The nutrient level combined with high water temperatures cause algae blooms, slime and black smelly water where the Mashell River runs through my grandfather’s original homestead. We can no longer use it to swim in. I live on the river above the sewer plant the water there is fine and I let my grandchildren swim in it.

It appears with the number of errors found by causal reading by an ordinary citizen that this document lacks enough credibility to secure a permit reauthorization. Enclosed is map showing the Little Mashell River.

Sincerely Yours,

Ecology’s Response to Mr. Van Eaton’s Letter:

The factual errors noted in the letter would not have a bearing on permit limits or the effectiveness of the permit. The errors will be noted and changes made to the fact sheet when the permit comes up for full renewal during the next permit cycle.

The permit limits for the Town of Eatonville are based on design flows for a maximum month of 0.534 MGD. The highest reported flow to date from the Town of Eatonville WWTF has been 0.234 MGD as a monthly average. The river flow was taken from USGS station 12087000 Mashel River near La Grande, WA. I looked at the data from USGS station 12087000 and calculated the 7Q10 to be very close to 8 cfs. The Department uses a design maximum month flow together with a seven-day average low flow in the receiving water as a very conservative approach to calculating limits for WWTFs.

I understand that there are other reaches that enter the Mashel River that increase base flows so that the actual flow upstream near the WWTF would be lower. This is why we try to get a gauge as close as possible to the outfall and use 7Q10s (the lowest seven day average flow with a

recurrence of ten years) and in Eatonville's case 7Q20s to calculate permit limits as a means to error on the side of conservatism.

The Town's wastewater flows are still well below what the WWTF was designed for and the current permit limits were based on a combination of very conservative river flows and effluent flows. I have looked the numbers over and determined that the effluent limits would not change from the existing permit and requested a reauthorization of the current permit. Wastewater flows would need to increase 2 1/4 times before the current permit limits would need to change. The current permit limits imposed on the Town of Eatonville WWTF are protective of the state water quality standards and will remain protective for many years to come.